

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHOSHANA HEBSHI,
Plaintiff,
v.

UNITED STATES OF AMERICA; FRONTIER AIRLINES, INC.; JOHN BRAND, in his individual capacity; UNKNOWN FBI AGENT 1, in his individual capacity; UNKNOWN FBI AGENT 2, in his individual capacity; MARK DEBEAU, in his individual capacity; JEREMY BOHN, in his individual capacity; CAPTAIN PATRICK DRISCOLL, in his individual capacity; OFFICER GRANT, in his individual capacity; LT. M. WASIUKANIS, in his individual capacity; TOYA PARKER, in her individual capacity; DT. CARMONA, in his or her individual capacity; OFFICER JOHNSON, in his or her individual capacity; CORP. BRADLEY, in his or her individual capacity; UNKNOWN CBP OFFICER, in his individual capacity; DAVID LAKATOS, in his individual capacity; NATHANIEL DEVINS, in his individual capacity; UNKNOWN TSA AGENT 1, in his individual capacity; UNKNOWN TSA AGENT 2, in her individual capacity; ROBERT BALL, in his individual capacity; UNKNOWN ICE OFFICER, in his individual capacity; and PAUL BRUMLEY, in his individual capacity,

Defendants.

and

MARK DEBEAU, OFFICER GRANT, TOYA PARKER, DET. CARMONA, OFFICER JOHNSON, JEREMY BOHN, CAPTAIN PATRICK, DRISCOLL, LT. M.

Honorable Terrence G. Berg
Magistrate Judge Mona K.
Majzoub

Case No. 13-10253

**STIPULATED ORDER
EXTENDING DEADLINE
FOR PLAINTIFF'S
RESPONSE TO CERTAIN
WCAA DEFENDANTS'
FIRST SET OF
INTERROGATORIES**

WASIUKANIS,
and CORPORAL BRADLEY,

Cross-Plaintiffs,

v.

FRONTIER AIRLINES, INC.,

Cross-Defendant.

Michael J. Steinberg (P43085)
Kary L. Moss (P49759)
American Civil Liberties Union
Fund of Michigan
2966 Woodward Avenue
Detroit, MI 48201
(313) 578-6823
msteinberg@aclumich.org

Dennis D. Parker
Rachel E. Goodman
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2500/Fax: (212) 549-2651
rgoodman@aclu.org

William H. Goodman (P14173)
Julie H. Hurwitz (P34720)
Kathryn Bruner James (P71374)
Miriam R. Nemeth (P76789)
Goodman & Hurwitz, P.C.
Cooperating Attorneys, American Civil
Liberties Union Fund of Michigan
1394 E. Jefferson Ave.
Detroit, MI 48207
(313) 567-6170
mail@goodmanhurwitz.com

Anna Engh
Shelli Calland
Sarah Tremont (P73809)
Liza Khan
Covington & Burling LLP
1201 Pennsylvania Ave., N.W.
Washington D.C. 20004
(202) 662-6000
aengh@cov.com
scalland@cov.com
stremont@cov.com
lkhan@cov.com

Alan B. Havis (P36988)
Law Offices of Alan B. Havis Esq.
25505 W. 12 Mile Road, Suite 100
Southfield, MI 48034
(248) 353-3690
ahavis@AirportDefender.com
Attorney for Debeau, Grant, Parker, Carmona, & Johnson

T. Joseph Seward (P35095)
Cummings McClorey Davis & Acho
33900 Schoolcraft Road
Livonia, MI 48150
(248) 261-2400/Fax:
tjseward@cmda-law.com
Attorneys for Bohn, Driscoll, Wasiukanis, & Bradley

Paula L. Wegman
Brian T. Maye
Steven L. Boldt
ADLER MURPHY & McQUILLEN LLP
20 S. Clark Street, Suite 2500
Chicago, Illinois 60603
(312) 345-0700/5-Fax: (312) 345-9860
bmaye@amm-law.com

Alexander A. Ayar (P69623)
Foser, Swift, Collins & Smith, P.C.
32300 Northwestern Highway, Suite 230
Farmington Hills, MI 48334-1571
(248) 538-6326/Fax:
aayar@fosterswift.com
Attorneys for Frontier Airlines, Inc.

Sarah E. Whitman, Trial Attorney
U.S. Department of Justice, Civil Division
Torts Branch – Constitutional Torts Section
P.O. Box 7146
Ben Franklin Station
Washington, DC 20044
(202) 616-0089/Fax: (202) 616-4314
Sarah.Whitman@usdoj.gov

Attorneys for Plaintiff

Lynn M. Dodge
Assistant United States Attorney
United States Attorney's Office
211 W. Fort Street, Suite 2001
Detroit, MI 48226
(313) 226-0205
Lynn.Dodge@usdoj.gov
Attorney for Brand, Lakatos, Devins, Ball, Brumley, & USA

STIPULATED ORDER EXTENDING DEADLINE FOR PLAINTIFF'S RESPONSE TO THE WCAA DEFENDANTS' FIRST SET OF INTERROGATORIES

Upon stipulation between the Plaintiff and Defendants Bohn, Driscoll, Wasiukanis, and Bradley (collectively, "certain WCAA Defendants"), by and through their attorneys, and the Court otherwise being fully advised of the following facts in the premises:

1. Presently at issue in this 42 U.S.C. § 1983 action are interrogatories that certain WCAA Defendants have served on Ms. Hebshi. These requests were served on Ms. Hebshi on May 29, 2014, and Ms. Hebshi's Responses were due on June 30, 2014.

2. Pursuant to Federal Rule of Civil Procedure 33(b)(2), although "[t]he responding party must serve its answers and objections within 30 days after being served with the interrogatories[,] [a] shorter or longer time may be stipulated to under Rule 29 or be ordered by the Court."

3. On June 27, 2014, in a meet-and-confer between the parties, Plaintiff's counsel requested an extension of the June 30 deadline because the

Plaintiff was moving homes and also leaving on an extended family vacation. Counsel for certain WCAA Defendants agreed to extend the Plaintiff's deadline for responses and objections until August 4, 2014, but asked that a Court Order be entered to that effect.

Therefore, it is hereby **STIPULATED AND ORDERED** that the deadline for the Plaintiff's responses and objections to certain WCAA Defendants' First Set of Interrogatories is extended until August 4, 2014.

IT IS SO ORDERED.

s/Terrence G. Berg

Honorable Terrence G. Berg

Dated: July 3, 2014

Counsel for the Parties agree to the above Stipulated Order on June 30, 2014:

GOODMAN & HURWITZ, P.C.

By: /s/Miriam R. Nemeth

Miriam R. Nemeth (P76789)

On Behalf of the Plaintiff

CUMMINGS, MCLOREY, DAVIS & ACHO

By: /s/T. Joseph Seward

T. Joseph Seward (P35095)

On Behalf of the WCAA Defendants